

United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED  
DEC 17 2019

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

RS

UNITED STATES OF AMERICA

V.

CR 19 0700

FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez,  
a/k/a Daniel Sanchez Bustos, and  
JOSE IVAN SANCHEZ

DEFENDANT(S).

INDICTMENT

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(c) – Conspiracy to Distribute and Possess with Intent to Distribute  
Methamphetamine and Cocaine;  
21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine (Multiple Counts);  
21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Cocaine;  
21 U.S.C. § 853 – Forfeiture Allegation  
18 U.S.C. § 2 – Aiding and Abetting

A true bill.

True Bill

*[Signature]*

Foreman

Filed in open court this 17 day of

December 2019

*[Signature]*

ROSE MAHER

Clerk

*[Signature]*

THOMAS S. HIXSON  
UNITED STATES MAGISTRATE JUDGE

Bail, \$

NO PROCESS

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING

**OFFENSE CHARGED**

See Attachment

- ☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: See Attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SUSAN Y. SOANG SAN FRANCISCO DIVISION

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

Froylan Sanchez, a/k/a Froylan Azhea Martinez-Sanchez,  
a/k/a Daniel Sanchez Bustos

DISTRICT COURT NUMBER

CR 19 0700

RS

**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

SA Landon Hoffman, Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court,  
give name of court

☐ this person/proceeding is transferred from another district  
per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of  
charges previously dismissed  
which were dismissed on motion  
of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW  
DOCKET NO.
☒ this prosecution relates to a  
pending case involving this same  
defendant
MAGISTRATE  
CASE NO.
☒ prior proceedings or appearance(s)  
before U.S. Magistrate regarding this  
defendant were recorded under

19-mj-72010

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Sloan Heffron

**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior  
summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges  
If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes  
been filed? ☐ No

If "Yes"  
give date  
filed

DATE OF  
ARRESTMonth/Day/Year  
12/12/19

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or  
warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments:

FILED

ATTACHMENT TO PENALTY SHEET

DEC 17 2019

**Count One: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C) - Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine and Cocaine**

SUSAN Y. SOONG  
U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

CR 19 0700

RS

**Count Two: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine**

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

**Count Three: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Cocaine**

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

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**FILED**

**DEC 17 2019**

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

**Count Four: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine**

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

**RS**

**CR 19 0700**

**Count Five: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine**

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

**FILED****DEC 17 2019****SUSP. SOON****CLERK'S DIVISION  
NORTH DISTRICT OF CALIFORNIA****DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**

See Attachment

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

PENALTY: See Attachment

Name of District Court and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

**DEFENDANT - U.S.**

▶ Jose Ivan Sanchez

DISTRICT COURT NUMBER

**CR 19 0700****RS****PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

SA Landon Hoffman, Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW  
DOCKET NO.☒ this prosecution relates to a pending case involving this same defendantMAGISTRATE  
CASE NO.☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

19-mj-72010

Name and Office of Person

Furnishing Information on this form DAVID L. ANDERSON

☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.  
Attorney (if assigned)

Sloan Heffron

**DEFENDANT****IS NOT IN CUSTODY**

- Has not been arrested, pending outcome this proceeding.
- 1) ☐ If not detained give date any prior summons was served on above charges ▶
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☒ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF  
ARRESTMonth/Day/Year  
12/12/19

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments:

**FILED****DEC 17 2019**SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA**ATTACHMENT TO PENALTY SHEET****Count One: 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C) - Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine and Cocaine**

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

**Count Two: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine**

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

**Count Three: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Cocaine**

- Maximum Penalties:
- Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))
  - Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))
  - Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))
  - Special Assessment: \$100 (18 U.S.C. § 3013)
  - Forfeiture
  - Denial of Federal Benefits
  - Immigration Consequences (including potential removal)

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**Count Four: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine**

Maximum Penalties: • Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))

• Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))

• Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))

• Special Assessment: \$100 (18 U.S.C. § 3013)

• Forfeiture

• Denial of Federal Benefits

• Immigration Consequences (including potential removal)

**FILED**  
**DEC 17 2019**

SNYDER, U. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

**CR 19 0700**

**RS**

**Count Five: 21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine**

Maximum Penalties: • Imprisonment: 20 years (21 U.S.C. § 841(b)(1)(C))

• Fine: \$1,000,000 (21 U.S.C. § 841(b)(1)(C))

• Supervised Release: life (with minimum of 3 years) (21 U.S.C. § 841(b)(1)(C))

• Special Assessment: \$100 (18 U.S.C. § 3013)

• Forfeiture

• Denial of Federal Benefits

• Immigration Consequences (including potential removal)

1 DAVID L. ANDERSON (CABN 149604)  
2 United States Attorney

FILED

DEC 17 2019

SUSAN Y. SOUZA  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

RS

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez,  
15 a/k/a Daniel Sanchez Bustos, and

16 JOSE IVAN SANCHEZ,

17 Defendants.  
18

CASE NO. 19 0700

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C) –  
Conspiracy to Distribute and Possess with Intent to  
Distribute Methamphetamine and Cocaine;  
21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of  
Methamphetamine (Multiple Counts);  
21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of  
Cocaine;  
21 U.S.C. § 853 – Forfeiture Allegation;  
18 U.S.C. § 2 – Aiding and Abetting

19 INDICTMENT

20 The Grand Jury charges:

21 COUNT ONE: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C) – Conspiracy to Distribute and Possess  
22 with Intent to Distribute Methamphetamine and Cocaine)

23 Beginning on or about August 23, 2019, and continuing to on or about November 7, 2019, in the  
24 Northern District of California and elsewhere, the defendants,

25 FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez, a/k/a Daniel Sanchez Bustos, and  
26 JOSE IVAN SANCHEZ,

27 and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute  
28 and possess with intent to distribute a mixture and substance containing a detectable amount of

INDICTMENT



methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(C).

COUNT TWO: (21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine)

On or about August 23, 2019, in the Northern District of California, the defendants,

FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez, a/k/a Daniel Sanchez Bustos, and  
JOSE IVAN SANCHEZ,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THREE: (21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Cocaine)

On or about August 23, 2019, in the Northern District of California, the defendants,

FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez, a/k/a Daniel Sanchez Bustos, and  
JOSE IVAN SANCHEZ,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FOUR: (21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine)

On or about September 13, 2019, in the Northern District of California, the defendants,

FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez, a/k/a Daniel Sanchez Bustos, and

JOSE IVAN SANCHEZ,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIVE: (21 U.S.C. § 841(a)(1) and (b)(1)(C) – Distribution of Methamphetamine)

On or about November 7, 2019, in the Northern District of California, the defendants,

FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez, a/k/a Daniel Sanchez Bustos, and  
JOSE IVAN SANCHEZ,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION: (21 U.S.C. § 853(a))

The allegations contained above are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of any of the offenses alleged in Counts One through Five above, the defendants,

FROYLAN SANCHEZ,  
a/k/a Froylan Azhea Martinez-Sanchez, a/k/a Daniel Sanchez Bustos, and  
JOSE IVAN SANCHEZ,

shall forfeit to the United States all right, title, and interest in any property constituting and derived from any proceeds defendant obtained, directly or indirectly, as a result of such violations, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations, including but not limited to a forfeiture money judgment.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

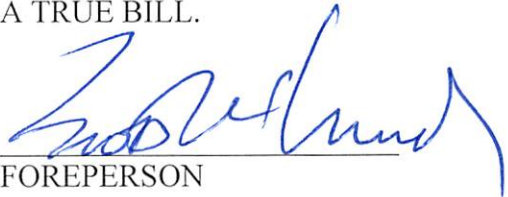
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 21, United States Code, Section 853, and Federal Rule of Criminal Procedure 32.2.

DATED:

12/17/19

A TRUE BILL.

  
FOREPERSON  
San Francisco

DAVID L. ANDERSON  
United States Attorney

  
SLOAN HEFFRON  
Assistant United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FILED

DEC 17 2019

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

CRIMINAL COVER SHEET

**Instructions:** Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

RS

CASE NAME:

USA V. FROYLAN SANCHEZ et al

CASE NUMBER:

CR 19 0700

This Case Under Seal?

Yes No ☒

Total Number of Defendants:

1 2-7 ☒ 8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes No ☒

Venue (Per Crim. L.R. 18-1):

SF ☒ OAK SJ

Is this a potential high-cost case?

Yes No ☒

Is any defendant charged with a death-penalty-eligible crime?

Yes No ☒

Is this a RICO Act gang case?

Yes No ☒

Assigned AUSA  
(Lead Attorney): Sloan Heffron

Date Submitted: 12/17/2019

Comments: